

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN**

In re:

Kerrie Lynn Antelo

Chapter 7

Case No. 07-00736

Honorable James D. Gregg

Debtor(s)

MOTION FOR RELIEF FROM THE AUTOMATIC STAY

NOW COMES Movant, Mortgage Electronic Registration Systems, Inc. as solely nominee for Decision One Mortgage Company, LLC it's successors and or assigns, by and through its attorneys, Orland Associates, P.C., and shows unto this Honorable Court as follows:

1. That Movant is the holder of a mortgage on real property owned by the debtor and located at 1110 Cambridge Dr, Kalamazoo, MI 49001 (the following document is attached the Mortgage);
2. Homecomings Financial, LLC is servicing agent for Movant;
3. That the debtor filed Chapter 7 Bankruptcy on February 5, 2007;
4. That pursuant to 11 U.S.C. § 362 (d)(1), upon request of a party in interest, the court shall grant relief from stay for cause, including lack of adequate protection of an interest in property of such party in interest;
5. That as of today's date said mortgage loan is delinquent and owing for December 1, 2006;
6. That the market value of the property pursuant to Debtor's Schedule D is approximately \$137,600.00;
7. That the total debt owing to Mortgage Electronic Registration Systems, Inc. as solely nominee for Decision One Mortgage Company, LLC it's successors and or assigns is approximately \$129,973.66;
8. That the value on the property after subtracting 10% for the cost of sale is \$123,840.00;
9. That the debtor's account delinquency and lack of non-exempt equity in the subject property constitutes cause for relief from the automatic stay;
10. That no other parties have an interest in the property located at 1110 Cambridge Dr, Kalamazoo, MI 49001 to the knowledge and belief of Movant;
11. That pursuant to Local Bankruptcy rule 9013(c)1(B) attached is a copy of the proposed Order Granting Relief from the Automatic Stay labeled as Exhibit "A";
12. That the entry of the order granting relief from the automatic stay shall be effective immediately upon entry, notwithstanding the provisions of FRBP 4001(a)(3).

WHEREFORE, Movant respectfully requests that this Court enter an Order Granting Relief from the Automatic Stay for good cause shown pursuant to 11 USC § 362(d)(1), and that entry of the order shall be effective immediately upon entry, notwithstanding the provisions of FRBP 4001(a)(3), and whatever other relief the Court deems just and equitable.

Date: February 8, 2007

Respectfully Submitted,

By: /s/ Heather M. Dickow P64757
Orlans Associates, P.C.
Attorneys for Mortgage Electronic Registration
Systems, Inc. as solely nominee for Decision
One Mortgage Company, LLC it's successors
and or assigns
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